

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

OUSSAMA EL OMARI,

Plaintiff,

v.

DECHERT LLP,  
NICHOLAS PAUL DEL ROSSO, and VITAL  
MANAGEMENT SERVICES, INC.,

Defendants.

Civil Action No. 23-cv-04607 (LAK) (OTW)

**STIPULATION GOVERNING  
PRESERVATION OF DOCUMENTS**

**WHEREFORE**, on June 1, 2023, Plaintiff Oussama El Omari (“Omari”) filed the instant action against Defendant Dechert LLP (“Dechert”), among others, alleging violation of 18 U.S.C. § 1030(a)(2)(C) (the “Computer Fraud and Abuse Act”), conspiracy to violate the same statute, and conversion, *see* ECF No. 1; and

**WHEREFORE**, on June 1, 2023, Plaintiff filed a Notice of Motion for Preliminary Injunction (the “Motion”) and related papers seeking an order directing the preservation of certain documents, namely “any email... containing the email addresses of Plaintiff (ceo@oussamaelomari.com and abousami2793@gmail.com), and the email addresses of his undersigned counsel, (smm@milopc.com)” (the “Omari Documents”), *see* ECF No. 6 ¶¶ 1, 2; and

**WHEREFORE**, Dechert does not admit having of any Omari Documents in its possession, custody, or control, but wishes to avoid burdening the Court with unnecessary motion practice and to amicably resolve the Motion;

**IT IS HEREBY STIPULATED AND AGREED**, by and between counsel for Plaintiff and Dechert that Dechert, in accordance with its obligations pursuant to the Federal Rules of Civil Procedure, and this Court’s Local Rules, agrees to maintain, and not destroy, delete, manipulate or

lose in any way, any Omari Documents, wherever located, that may be, or may come to be, in its possession, custody, or control.

Dated: August 21, 2023



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*Attorneys for Defendant Dechert LLP*

**SO ORDERED:** \_\_\_\_\_

**Dated:**